

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:

JUANA ORTIZ

* Debtor(s)

Case Number: 5-22-00155

Chapter: 13

CERTIFICATE OF MAILING

The undersigned employee in the office of:

Tullio DeLuca, Esquire

hereby certifies that a copy of the attached Notice of Motion to Sell Free and Clear of All Liens, Charges and Encumbrances was mailed today to all parties named on the mailing list attached hereto by regular first class mail.

DATED: March 27, 2025

SIGNED: Lisa Marchant

TITLE: Legal Assistant

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JUANA ORTIZ

Debtor

CASE NO. 5-22-00155

JUANA ORTIZ

Movant

vs.

LUZERNE COUNTY TAX CLAIM

BUREAU, FAY SERVICING, HAZLETON

CITY AUTHORITY, MUNICIPAL AUTH OF

HAZLE TOWNSHIP, INTERNAL REVENUE:

SERVICE, PA DEPARTMENT OF REVENUE :

and JACK N. ZAHAROPOULOS, ESQUIRE :

Respondents

NOTICE OF DEBTOR'S MOTION TO APPROVE PRIVATE SALE OF REAL AND
PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CHARGES AND
ENCUMBRANCES

NOTICE IS HEREBY GIVEN THAT:

Debtor, Juana Ortiz, resides at 620 Putnam St., Hazleton, PA and seeks leave to sell real property of the above captioned case located at 620 Putnam St., Hazleton, PA, along with personal property and fixtures to Radhames Seijas Araujo, for the sum of Two Hundred Forty Thousand (\$240,000.00) Dollars. The sale is to be free and clear of all liens, charges and encumbrances, with all valid liens and encumbrances to be paid at time of closing.

The Debtors further request the Court to allow distribution of the proceeds from the sale of real and personal property as follows:

- a. Any out-of-pocket expenses advanced by Tullio DeLuca, Esquire in connection with the sale of the aforementioned property, and which have not been reimbursed at the time of settlement along with an attorney fee of \$1,500.00;
- b. Any Notarization and/or incidental recording fees associated with the sale of the above property;
- c. Realtors Commission of 6% of the sales price;
- d. Any transfer tax which is the responsibility of the seller herein;
- e. Any unpaid real estate taxes and other municipal claims/liens arising from property;

- f. Payment in full to Fay Servicing.;
- g. That any other unpaid liens shall attach to the remaining sale proceeds;
- h. Debtor's exemption if any;
- I. The net sale proceeds in an amount to pay the balance owed to the Chapter 13 Trustee, if any, from the above sale shall be paid to Jack N. Zaharopoulos, Esq., Chapter 13 Trustee, for distribution to creditors in accordance with the Debtor's confirmed Plan

The Sale is not subject to higher and better offers.

Any inquiries regarding the sale and/or to request for copies of the motion or a time and date to examine the property prior to the sale, can be made directly to Debtor's Counsel, Tullio DeLuca, Esquire.

Hearing on any Answers or Objections will be heard on May 08, 2025 at 10:00am. If no objection and request for hearing are timely filed with the Bankruptcy Clerk, 197 South Main Street, Wilkes-Barre, PA 18701 to the sale of the aforementioned real and personal property on the above terms and conditions on or before **April 17, 2025** the Court may grant the relief requested. If you desire to contest this matter, file a written objection in the form of responsive pleading and request a hearing with a copy to Tullio DeLuca, Esquire at the address below: Any filing must conform to the Rule of Bankruptcy Procedures unless the Court determines otherwise.

Date of Notice: March 27, 2025

Tullio DeLuca, Esquire
381 N 9th Avenue
Scranton, PA 18504
(570) 347-7764

Hazleton City Authority
400 East Author Gardner Parkway
Hazleton, PA 18201-7395

Municipal Authority of Hazle Township
PO Box 502
Harleigh, PA 18225-0502

U.S. Bank Trust National Association, as Tru
c/o McCalla Raymer Leibert Pierce, LLC
Bankruptcy Department
1544 Old Alabama Road
Roswell, GA 30076-2102

Community Loan Servicing, LLC
4426 Ponce de Leon Blvd., 5th Floor
Coral Gables, FL 33146

Community Loan Servicing, LLC
f/k/a Bayview Loan Servicing, LLC
4425 Ponce De Leon Blvd., 5th Floor
Coral Gables, FL 33146-1839

Fay Servicing
425 S. Financial Pl. Suite 2000
Chicago, IL 60605-1000

Greater Hazleton Joint Sewer Authority
500 Oscar Thomas Drive
P.O. Box 651
Hazleton, PA 18201-0651

Hazleton City Authority
400 E. Arthur Gardner Pkwy.
Hazleton, PA 182010-7395

Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976-3403

U.S. Bank Trust National Association, et al.
Fay Servicing, LLC
PO Box 814609
Dallas, TX 75381-4609

United States Trustee
228 Walnut Street, Suite 1180
Harrisburg, PA 17101-1722

Yajaira Ortiz
604 Landmesser Ave.
Hazleton, PA 18202-2151

JACK N ZAHAROPOULOS
ATTN CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036-8625